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January 18, 2019

The Honorable Jocelyn G. Boyd  
Chief Clerk/Administrator  
The Public Service Commission of South Carolina  
101 Executive Center Drive, Suite 100  
Columbia SC 29210

Re: **Application of Duke Energy Carolinas, LLC for Adjustments in Electric  
Rate Schedules and Tariffs and Request for Accounting Order  
Docket No.: 2018-319-E**

Dear Mrs. Boyd:

Enclosed for filing please find Duke Energy Carolinas, LLC's (the "Company") Supplemental Direct Testimony of Kim H. Smith, Smith Supplemental Exhibit 1 and Updated Smith Exhibit 2. This filing presents illustrative updates to certain accounting and pro forma adjustments and presents additional adjustments to the Company's cost of service as shown on Smith Supplemental Exhibit 1. Additionally the Company presents updates to the proposed Excess Deferred Income Tax ("EDIT") rider as shown in Updated Smith Exhibit 2.

Please do not hesitate to contact me if you have any questions or require any further information.

Sincerely,

Heather Shirley Smith

Enclosure

cc: Nanette Edwards, Esq., Office of Regulatory Staff  
Dawn Hipp, Office of Regulatory Staff  
Jeffrey M. Nelson, Esq., Office of Regulatory Staff  
Ms. Carri Grube Lybarker, Esq., SC Department of Consumer Affairs  
Ms. L. Becky Dover, Esq., SC Department of Consumer Affairs  
Service List

**BEFORE  
THE PUBLIC SERVICE COMMISSION OF SOUTH CAROLINA**

**DOCKET NO. 2018-319-E**

In the Matter of:	)	
	)	<b>SUPPLEMENTAL DIRECT</b>
Application of Duke Energy Carolinas,	)	<b>KIM H. SMITH</b>
LLC for Adjustments in Electric Rate	)	<b>FOR DUKE ENERGY</b>
Schedules and Tariffs	)	<b>CAROLINAS, LLC</b>

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**I. INTRODUCTION AND PURPOSE**

1   **Q.   PLEASE STATE YOUR NAME, BUSINESS ADDRESS, AND**  
2       **CURRENT POSITION.**

3   A.   My name is Kim H. Smith and my business address is 550 South Tryon  
4       Street, Charlotte, North Carolina. I am a Director of Rates and  
5       Regulatory, employed by Duke Energy Carolinas, LLC, testifying on  
6       behalf of Duke Energy Carolinas (“DE Carolinas” or the “Company”).

7   **Q.   ARE YOU THE SAME KIM H. SMITH WHOSE DIRECT**  
8       **TESTIMONY AND EXHIBITS WERE FILED IN THIS DOCKET**  
9       **ON NOVEMBER 8, 2018?**

10  A.   Yes.

11  **Q.   WHAT IS THE PURPOSE OF YOUR SUPPLEMENTAL DIRECT**  
12       **TESTIMONY IN THIS PROCEEDING?**

13  A.   The purpose of my supplemental direct testimony is to present updates to  
14       certain accounting and pro forma adjustments and present additional  
15       adjustments to the Company’s cost of service as shown on Smith  
16       Supplemental Exhibit 1. As I stated on page 13 of my direct testimony,  
17       several adjustments included in the Company’s original filing contained  
18       projections that the Company reserved the right to update with actuals  
19       prior to the hearing. In my supplemental direct testimony, I update those  
20       adjustments to reflect actuals. I also update or present adjustments based  
21       on circumstances and events that have occurred since the Company made  
22       its November 8, 2018 filing. Finally, I present updates to the Company’s

1 proposed Excess Deferred Income Tax ("EDIT") rider as shown in  
2 Updated Smith Exhibit 2.

**II. UPDATES TO THE COMPANY'S TEST YEAR  
OPERATING REVENUE, EXPENSES AND RATE BASE**

3  
4 **Q. PLEASE DESCRIBE SMITH SUPPLEMENTAL EXHIBIT 1.**

5 A. Smith Supplemental Exhibit 1 presents the illustrative impact of additional  
6 adjustments to the Company's cost of service. While DE Carolinas is not  
7 requesting a change in its proposed revenue requirement as a result of  
8 these adjustments at this time, Smith Supplemental Exhibit 1 illustrates the  
9 impact these adjustments (e.g., updating costs to reflect actuals) would  
10 have on the Company's cost of service.

11 **Q. WAS SMITH SUPPLEMENTAL EXHIBIT 1 PREPARED BY YOU  
12 OR AT YOUR DIRECTION AND UNDER YOUR SUPERVISION?**

13 A. Yes.

14 **Q. PLEASE EXPLAIN THE ADJUSTMENTS THAT ARE  
15 PRESENTED IN SMITH SUPPLEMENTAL EXHIBIT 1.**

16 A. **Line 1 - Annualize retail revenues for current rates**

17 This adjustment has been updated to reflect the change in the fuel cost  
18 factors effective October 1, 2018 and a correction to billed revenues. The  
19 fuel cost factors utilized in the Company's November 8, 2018 filing were  
20 the Company's fuel cost factors as of October 1, 2017. The fuel cost  
21 factors effective October 1, 2017 were used in the original filing because  
22 the Company was unable to incorporate the fuel cost factors effective

1           October 1, 2018 due to the close proximity of the Commission's approval  
2           of the factors and the filing date of this case.

3           **Line 2 – Update fuel costs to approved rate and other fuel revenue**  
4           **adjustments**

5           This adjustment has been updated to reflect the change in the fuel cost  
6           factors effective October 1, 2018 for the reasons provided for the  
7           adjustment to Line 1.

8           **Line 3 – Adjust Other Revenue**

9           This adjustment has been added to adjust other revenue to reflect proposed  
10          changes to the Basic Facilities Charges. The proposed changes are  
11          discussed further in Witness Pirro's filed direct testimony.

12          **Line 4 – Adjust the amount of CWIP included in Rate Base**

13          This adjustment has been updated to reflect the actual construction work  
14          in progress ("CWIP") as of December 31, 2018. The CWIP balance was  
15          estimated in the Company's November 8, 2018 filing.

16          **Line 11 - Adjust for post test year additions to plant in service**

17          This adjustment has been updated to reflect the actual additions to plant in  
18          service from October 1, 2018 through December 31, 2018. These  
19          additions were estimated in the Company's November 8, 2018 filing. This  
20          adjustment also reflects the addition of land held for future use which  
21          resulted in a change in rate base and property tax expense. The land held  
22          for future use included in this adjustment is the non-depreciable land costs  
23          removed in Line 14.

**Line 12 – Reflect 2017 Lee Combined Cycle addition to plant in service**

This adjustment has been updated to reflect the actual electric plant in service balance for the Lee CC project to include in rate base as of December 31, 2018. This balance was estimated in the Company's November 8, 2018 filing. Rate base was also adjusted to include the impact of bonus depreciation.

**Line 13 – Amortize deferred cost balance related to Lee Combined Cycle**

This adjustment updates the projected Regulatory Asset balance as of May 31, 2019. This balance was estimated in the Company's November 8, 2018 filing.

**Line 14 – Adjust for Lee Nuclear amortization**

This adjustment updates the proposed Regulatory Asset balance, consisting of Lee nuclear development costs, adjusted to remove non-depreciable land costs and estimated expenditures through May 31, 2019. This balance was estimated in the Company's November 8, 2018 filing.

**Line 15 – Adjust reserve for end of life nuclear costs**

This adjustment reflects an update to a calculation to accurately reflect the impact to rate base.

**Line 18 - Amortize deferred environmental costs**

1 This adjustment has been updated to reflect the actual costs and plant  
2 additions from October 1, 2018 through December 31, 2018. These costs  
3 were estimated in the Company's November 8, 2018 filing.

4 **Line 19 - Amortize deferred cost balance related to SC AMI**

5 This adjustment has been updated to reflect the actual South Carolina  
6 Advanced Metering Infrastructure ("SC AMI") plant additions from  
7 October 1, 2018 through December 31, 2018. These amounts were  
8 estimated in the Company's November 8, 2018 filing. Rate base was also  
9 adjusted to reflect the impact of bonus depreciation.

10 **Line 22 – Normalize O&M labor expense**

11 This adjustment reflects an updated calculation to accurately reflect the  
12 impact to operating income.

13 **Line 23 - Update benefits costs**

14 This adjustment has been updated to reflect the actual 2018 expenses for  
15 active medical benefits. These amounts were projected in the Company's  
16 November 8, 2018 filing. This adjustment also reflects an updated  
17 calculation to accurately reflect the impact to operating income.

18 **Line 25 - Amortize rate case costs**

19 This adjustment has been updated to reflect the actual rate case costs from  
20 October 1, 2018 through December 31, 2018. These amounts were  
21 estimated in the Company's November 8, 2018 filing.

22 **Line 30 - Adjust for Customer Connect additional expense and**  
23 **deferral**

1 The Customer Connect deferred balance in this adjustment was updated to  
2 reflect the actual costs incurred from October 1, 2018 through December  
3 31, 2018. These costs were estimated in the Company's November 8,  
4 2018 filing.

5 **Line 31 - Adjust vegetation management expenses**

6 This adjustment was updated to reflect known increases in contract rates  
7 that were finalized in December 2018. The amount of these increases was  
8 not known at the time of the original filing.

9 **Line 32 - Synchronize interest expense with end of period rate base**

10 This adjustment has been updated to reflect a change to income taxes.  
11 Specifically, because of the updates to rate base described in this  
12 supplemental testimony, interest costs have been updated resulting in a  
13 flow through effect to income taxes.

14 **Line 33 - Adjust 1/8 O&M for accounting and pro-forma adjustments**

15 This adjustment has been updated to reflect the changes to cash working  
16 capital resulting from the other changes discussed herein.

17 **Line 34 - Adjust for Federal tax rate change**

18 This adjustment has been updated to align tax expense with the final cost  
19 of service filed.

20 **Line 35 - Adjust deferred cost balance related to SC Grid**

21 This adjustment has been updated to reflect the actual SC grid  
22 improvement costs and plant additions from October 1, 2018 through

1 December 31, 2018. These costs were estimated in the Company's  
2 November 8, 2018 filing.

3 **Line 36 – Remove certain expenses - NEW**

4 This adjustment was added to remove expenses that may either have been  
5 inadvertently booked above the line during the Test Period or  
6 inadvertently allocated to South Carolina. While it is possible these  
7 charges were reversed in subsequent journal entries, the Company has  
8 opted to voluntarily remove the amounts from this case.

9 **Q. DOES SMITH SUPPLEMENTAL EXHIBIT 1 REFLECT ANY**  
10 **CHANGE IN THE REVENUE REQUIREMENT SOUGHT BY THE**  
11 **COMPANY IN THIS PROCEEDING?**

12 A. No, not at this time. DE Carolinas will file an updated Smith Exhibit 1 at  
13 the time of the hearing, which will incorporate the additional cost of  
14 service adjustments reflected in Smith Supplemental Exhibit 1 as well as  
15 other possible adjustments to cost of service to the extent the actual  
16 changes are based on circumstances and events occurring up to the time  
17 the hearing is closed.

18 **Q. IN YOUR OPINION, DO THESE ACCOUNTING AND PRO**  
19 **FORMA ADJUSTMENTS REFLECT KNOWN AND**  
20 **MEASURABLE CHANGES TO THE COMPANY'S TEST YEAR**  
21 **OPERATING EXPENSES, REVENUES, AND RATE BASE?**

22 A. Yes.

**III. UPDATES TO THE COMPANY'S PROPOSED EDIT RIDER**

1   **Q.   PLEASE EXPLAIN THE UPDATES TO THE COMPANY'S**  
2       **PROPOSED EDIT RIDER SHOWN IN UPDATED SMITH**  
3       **EXHIBIT 2?**

4   A.   Several updates were made to Smith Exhibit 2 to include actual balances  
5       or more recently available information. The total impact of the updates  
6       was a decrease in the Year 1 decrement rider of \$720,000 (from -  
7       \$62,612,000 to -\$61,892,000), shown on Page 2, Line 6. Below is the  
8       detail of the updates:

- 9       • The federal EDIT liability balances were updated as of December 31,  
10       2018, as shown on Line 1a of Page 1. These updates reflect true-ups  
11       that were made during 2018 to the December 31, 2017 balances.
- 12       • The ARAM rate, the amortization rate required for the federal EDIT –  
13       protected balance, on line 8 of Page 1 was also updated based on a  
14       more recent calculation by the Company's Tax Department.
- 15       • The deferred revenues shown on Line 4 of Page 1 and calculated on  
16       Page 3 were updated with actual deferred amounts for October 1, 2018  
17       through December 31, 2018. These amounts were estimated in the  
18       Company's November 8, 2018 filing.
- 19       • The NC EDIT balance on Line 1a of Page 1 was updated with the  
20       actual balance as of December 31, 2018. This amount reflects updated  
21       activity from the December 31, 2017 balances in the Company's  
22       November 8, 2018 filing.

**IV. CONCLUSION**

1   **Q.    DOES THIS CONCLUDE YOUR PRE-FILED SUPPLEMENTAL**  
2       **DIRECT TESTIMONY?**

3   **A.    Yes.**

4

**DUKE ENERGY CAROLINAS, LLC**  
**DOCKET NO. 2018-319-E**  
**SUPPLEMENTAL CHANGES TO OP INCOME AND RATE BASE**  
**FOR THE TEST PERIOD ENDED DECEMBER 31, 2017**  
(Thousands of Dollars)

**Smith Exhibit 1 Supplemental Summary**

<u>Description</u>	<u>Ref #</u> <u>Smith Exh 1</u>	<u>Change in Op</u> <u>Income</u> [1]	<u>Change in</u> <u>Rate Base</u> [2]
1 Annualize Retail revenues for current rates	SC-0100	38,059	-
2 Update fuel costs to approved rate and other fuel related adjustments	SC-0200	(38,428)	-
3 Adjust Other Revenue	SC-0300	(2,044)	-
4 Adjust the amount of CWIP included in rate base	SC-0400	-	(3,556)
5 Eliminate unbilled revenues	SC-0500	-	-
6 Adjust for costs recovered through non-fuel riders	SC-0600	-	-
7 Amortize deferred cost balance related to Carolinas West Control Center	SC-0700	-	-
8 Annualize Depreciation on year end plant balances	SC-0800	-	-
9 Annualize property taxes on year end plant balances	SC-0900	-	-
10 Adjust for new depreciation rates	SC-1000	-	-
11 Adjust for post test year additions to plant in service	SC-1100	1,094	6,399
12 Reflect 2017 Lee Combined Cycle addition to plant in service	SC-1200	(278)	7,440
13 Amortize deferred cost balance related to Lee Combined Cycle	SC-1300	(312)	623
14 Adjust for Lee Nuclear amortization	SC-1400	3	(37)
15 Adjust reserve for end of life nuclear costs	SC-1500	-	(10,470)
16 Adjust coal inventory	SC-1600	-	-
17 Adjust for approved regulatory assets and liabilities	SC-1700	-	-
18 Amortize deferred environmental costs	SC-1800	78	(312)
19 Amortize deferred cost balance related to SC AMI	SC-1900	481	(961)
20 Normalize for storm costs	SC-2000	-	-
21 Annualize O&M non-labor expenses	SC-2100	393	-
22 Normalize O&M labor expenses	SC-2200	556	-
23 Update benefits costs	SC-2300	1,327	-
24 Levelize nuclear refueling outage costs	SC-2400	-	-
25 Amortize rate case costs	SC-2500	-	-
26 Adjust aviation expenses	SC-2600	-	-
27 OPEN	SC-2700	-	-
28 Adjust for credit card fees	SC-2800	-	-
29 Adjust O&M for executive compensation	SC-2900	-	-
30 Adjust for Customer Connect Project	SC-3000	38	(77)
31 Adjust vegetation management expenses	SC-3100	(366)	-
32 Synchronize interest expense with end of period rate base	SC-3200	27	-
33 Adjust 1/8 O&M for accounting and pro-forma adjustments	SC-3300	-	6,053
34 Adjust for tax rate change	SC-3400	7	4
35 Adjust deferred cost balance related to SC Grid	SC-3500	207	(207)
36 Remove Certain Expenses	SC-3600	170	-
Total Supplemental Changes		1,014	4,899

[1] Operating Income: positive number increases operating income / negative number decreases operating income

[2] Rate Base: positive number increases rate base / negative number decreases rate base

**Duke Energy Carolinas, LLC**  
**DOCKET 2018-319-E**  
**UPDATED SMITH EXHIBIT 2**  
**FOR THE TEST PERIOD ENDED December 31, 2017**  
**SOUTH CAROLINA RETAIL**  
**Excess Deferred Income Tax Rider Calculation**  
**(Dollars in thousands)**

		Federal EDIT - Protected SC Retail	Federal EDIT - Unprotected, PP&E related SC Retail	Federal EDIT - Unprotected, non PP&E related SC Retail	Deferred Revenue, DERP Solar Rebate SC Retail	NC EDIT SC Retail	Total SC Retail
		(A)	(B)	(C)	(D)	(E)	(F)
1 Regulatory liability including gross up as of 12/31/2017	[1]	\$ (409,903)	\$ (269,477)	\$ (57,927)	\$ -	(83,686)	(820,993)
1a Regulatory liability including gross up updated as of 12/31/2018	[1](a)	\$ (421,534)	\$ (269,654)	\$ (57,497)		(87,003)	(835,688)
2 Estimated transition of Protected to Unprotected Regulatory liability during 2018	[1]	\$ 10,665		\$ (10,665)			-
3 DERP Deferral Balance for Solar Rebate as of 9/30/2018	[1]				\$ 40,119		40,119
4 Deferred Revenue for Federal Tax Rate Change as of 12/31/2018	[2]				\$ (69,671)		(69,671)
5 Regulatory liability for federal tax change including gross up for Year 1 rider calculation (Sum of L1a to L4)		\$ (410,869)	\$ (269,654)	\$ (68,162)	\$ (29,552)	\$ (87,003)	(865,241)
6 Allocation to SC Retail excluding Greenwood	[3]	99.68%	99.68%	99.68%	99.68%	99.68%	99.68%
7 Regulatory liability for federal tax change including gross up for SC Retail excluding Greenwood (L5 x L6))		(409,542)	(268,783)	(67,941)	(29,457)	(86,722)	(862,445)
8 Annual Amortization percentage		2.53%	5.00%	20.00%	20.00%	20.00%	7.03%
9 Annual amortization amount (L7 x L8)		(10,361)	(13,439)	(13,588)	(5,891)	(17,344)	(60,625)
10 Years of rider amortization		39.53	20	5	5	5	

[1] Excess deferred tax liability (EDIT) as of 12/31/2017 by jurisdiction

EDIT related to the federal tax changes booked to the 0254036 account is included in other Working Capital in the per books cost of service, net of offsetting ADIT in the 190 account.

NC EDIT liability booked to the 0253600 account, was included in Other Working Capital in the per books COSS.

DERP Solar Rebates are deferred to the 0182494 account

[1](a) Federal and NC EDIT balances updated based on actual balances as of 12/31/2018, and forecast 2018 transition between categories based on Tax analysis of this updated ADIT

[2] Smith Exhibit 2, Page 3, Line 3. Deferred revenues in the 0229010 account balance as of 12/31/2018.

[3] Allocation - SCRGW - NETPLT w Nfuel

Duke Energy Carolinas, LLC  
DOCKET 2018-319-E  
UPDATED SMITH EXHIBIT 2  
FOR THE TEST PERIOD ENDED December 31, 2017  
SOUTH CAROLINA RETAIL  
Excess Deferred Income Tax Rider Calculation  
(Dollars in thousands)

			After Tax Weighted Average Cost of Capital (WACC)
<u>Cost of Capital per Smith Exhibit 1</u>	<u>Ratio</u>	<u>Rate</u>	
Debt	47.00%	4.63%	1.63%
Equity	53.00%	10.50%	5.57%
			7.20%
Statutory Tax Rate			24.95%
Retention factor for SC license tax, PSC Utility Assessment Fee			99.56%

Annual Rider Calculation

Amortization - From Page 1, L9															
Year	Line	Beginning Balance, Page 1, L7	Federal EDIT		Federal EDIT		Deferred		Ending Balance before Return	Average of Beginning and Ending Balance	EDIT Balance in Base Rates, Page 1, L1 x L6	Change in Regulatory Liability for Rider Return	Return for Rider	Rider Revenues	Rider Revenues incl. SC license Tax, PSC Utility Assessment Fee
			Federal EDIT - Protected	Unprotected, PP&E related	Unprotected, non PP&E related	Revenue, DERP Solar Rebate	NC EDIT	Total Amortization							
			(A)	(B)	(C)	(D)	(E)	(F)							
Jun 19- May 20	1	(862,445)	(10,361)	(13,439)	(13,588)	(5,891)	(17,344)	(60,625)	(801,821)	(\$832,133)	(818,340)	(\$13,793)	(\$993)	(61,618)	(61,892)
Jun 20- May 21	2	(801,821)	(10,361)	(13,439)	(13,588)	(5,891)	(17,344)	(60,625)	(741,196)	(\$771,508)	(818,340)	\$46,832	\$3,372	(57,253)	(57,507) [1]
Jun 21- May 22	3	(741,196)	(10,361)	(13,439)	(13,588)	(5,891)	(17,344)	(60,625)	(680,571)	(\$710,884)	(818,340)	\$107,457	\$7,737	(52,888)	(53,123) [1]
Jun 22- May 23	4	(680,571)	(10,361)	(13,439)	(13,588)	(5,891)	(17,344)	(60,625)	(619,947)	(\$650,259)	(818,340)	\$168,081	\$12,102	(48,523)	(48,739) [1]
Jun 23- May 24	5	(619,947)	(10,361)	(13,439)	(13,588)	(5,891)	(17,344)	(60,625)	(559,322)	(\$589,634)	(818,340)	\$228,706	\$16,467	(44,158)	(44,354) [1]
												Rider Revenues incl. SC license Tax, PSC Utility Assessment	\$0	Initial Filing:	Incr. (decr.) with Update
6												Jun 19- May 20	(61,892)	(62,612)	720

[1] The rider amounts for years 2 through 5 are shown for illustrative purposes only. Actual rider amounts will be filed each year with updates discussed in my testimony by March 31 for Commission approval.

**Duke Energy Carolinas, LLC**  
**DOCKET 2018-319-E**  
**UPDATED SMITH EXHIBIT 2**  
**FOR THE TEST PERIOD ENDED December 31, 2017**  
**SOUTH CAROLINA RETAIL**

Page 3 of 3 **\$0**

Projected Deferred Revenue for Federal Tax Rate Change in account 0229010

SC Retail

1	Deferrals booked as of 12/31/2018	(\$69,670,981)
2	Forecast deferrals	\$0
3	Deferred Revenue for Federal Tax Rate Change as of 12/31/2018 (L1 + L2)	<hr/> (\$69,670,981)

**BEFORE  
THE PUBLIC SERVICE COMMISSION  
OF SOUTH CAROLINA  
DOCKET NO. 2018-319-E**

IN RE: Application of Duke Energy Carolinas, )  
 LLC for Adjustments in Electric Rate ) CERTIFICATE OF SERVICE  
 Schedules and Tariffs and Request for an )  
Accounting Order )

This is to certify that I, Toni Hawkins, a paralegal with the law firm of Robinson Gray Stepp & Laffitte, LLC have this day served copies of **Duke Energy Carolinas, LLC's Supplemental Direct Testimony of Kim H. Smith, Smith Supplemental Exhibit 1 and Updated Smith Exhibit 2** in the foregoing matter via electronic mail as follows:

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Dated at Columbia, South Carolina this 18<sup>th</sup> day of January, 2019.

*Toni C. Hawkins*